

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Telephone Number Portability)

CC Docket No. 95-116

RM 8535

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NYNEX REPLY COMMENTS

I. INTRODUCTION

The NYNEX Telephone Companies (NYNEX)¹ submit these Reply Comments in response to Comments filed on a Public Notice of the Federal Communications Commission (the Commission) requesting further comments on Telephone Number Portability, released in CC Docket 95-116 on March 14, 1996 (the Notice).² The Commission specifically requests comment on how the passage of the Telecommunications Act of 1996 (the Act) on February 8, 1996 may affect the issues raised in the Commission's Telephone Number Portability NPRM, adopted July 13, 1995. Set forth below is NYNEX's response to the views expressed in the Comments filed in this pleading cycle.

The Notice clearly stated, "we ask that parties not simply reiterate their previous comments, but confine their discussion to how particular issues have been affected, if at all."

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¹ The NYNEX Telephone Companies are New England Telephone and Telegraph Company and New York Telephone Company.

² Comments based on the Notice were due to the Commission on March 29, 1996. As of this filing, NYNEX has noted thirty-two Comments in response to the Commission's Notice.

Nevertheless, NYNEX's review of the Comments filed indicates that, rather than indicating how the passage of the Act had affected issues raised in the NPRM, many parties used this pleading as an opportunity to replay arguments they had previously made in the pleading cycle on the NPRM. These arguments have already been addressed in Comments and Replies on the NPRM. NYNEX will therefore confine this reply to two points of its Comments - the availability of a truly technically feasible long term database driven solution and the need for a Further Notice to develop appropriate cost recovery mechanisms. In addition, NYNEX addresses the attempts of some commenters to redefine number portability for purposes of the Act.

II. THE COMMISSION SHOULD UTILIZE INDUSTRY FORA TO HELP RESOLVE NUMBER PORTABILITY ISSUES.

The Comments demonstrate an obvious division within the industry as to (i) whether a technically feasible solution exists today, and (ii) how to determine where and when a solution should be deployed, if and when such a solution is developed.³

The recommendation made in NYNEX's Comments is thus particularly appropriate. That is, that the Commission utilize the expertise of industry fora and the experience of the states to help develop the technical feasibility, timing and cost of long term number portability deployment.⁴ Specifically, the Commission should utilize industry fora to develop a technically feasible solution as expeditiously as possible, utilizing state activities as input; provide guidelines for the transition to this solution; and provide the Commission with quarterly progress

³ "[T]here is no consensus on how final number portability should ultimately be provided." Bell Atlantic at 2. No long term solution exists. See GTE at 4 and Pacific at 8. The impact on OSS's must be accounted for as well. See GTE at 5.

⁴ NYNEX at 2-3.

reports once applications are deployed in the first offices. The Commission could direct its Chief Engineer to oversee and/or participate in these efforts as appropriate.⁵

Given the importance of number portability's proper implementation, NYNEX urges the Commission to use this approach since it will lead to a reasoned decision on the implementation of number portability. Industry fora can work, especially if they are given specific direction from the Commission.⁶ At a minimum, the fora can help to clarify what architectural issues need industry, national or regional resolution versus items that can be left to individual companies for design and implementation.⁷

III. A FURTHER NOTICE TO DEVELOP COST RECOVERY MECHANISMS IS APPROPRIATE.

The Comments provided little detail on costs and their appropriate recovery.⁸ As NYNEX noted, costs cannot be determined until the architecture, call processing flows, etc., of a truly technically feasible solution are identified and finalized.⁹ Given this uncertainty, much work remains to be done before costs can be quantified.

⁵ NYNEX at note 3.

⁶ See Georgia, which at 1, "...strongly urges the FCC to focus on broad guidelines and more general (rather than specific or detailed) rules in its Number Portability final order. Doing so will allow states flexibility for number portability implementation, and preserve the substantial progress of the states which have been first to require implementation of permanent number portability."

⁷ For example, Pacific, at 5, begins to lay out what design issues will require uniformity versus those that can be left to individual companies.

⁸ See Bell Atlantic at 2 for a broad estimated range of costs, but describing in note 4 the many areas that it has not yet been able to quantify.

⁹ NYNEX at 3-5.

Many parties, including NYNEX,¹⁰ offered the Commission broad principles for determining appropriate cost recovery mechanisms, noting the importance of resolving this issue if costs are to be borne on a competitively neutral basis.¹¹ But the fact that no party presented a complete solution demonstrates that much work remains to be completed on this issue.¹² Thus, NYNEX's recommendation for a Further Notice of Proposed Rulemaking¹³ to develop a complete record on these issues appears appropriate and justified. In issuing such a Further NPRM, the Commission should provide some "ground rules", as NYNEX has suggested, so that the Commission's view of how costs can be borne on a "competitively neutral basis" is made clear. From this point, parties can begin to develop the actual mechanisms that will allow proper and complete cost recovery.

IV. THERE IS NO LEGAL BASIS TO EXPAND THE DEFINITION OF NUMBER PORTABILITY UNDER THE ACT.

As numerous parties observed, the Act defines number portability as service provider portability.¹⁴ In fact, the Act states:

The term 'number portability' means the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another.¹⁵

¹⁰ NYNEX at 4-5.

¹¹ See, e.g., Bell Atlantic, at 1-2, noting that incumbents will incur most of the costs, that legislation gives them a right to recover those costs, and that resolution of cost recovery issues must occur as an integral part of any decision on how number portability is to be accomplished.

¹² Ameritech believes it has been able to resolve most issues, except for cost recovery, through the industry consensus process and is now recommending a Joint Board resolve this issue. (Ameritech at 2) At a minimum, before starting any Joint Board, the Commission should institute the Further NPRM to obtain cost data and cost recovery proposals from affected parties.

¹³ NYNEX at 4, which Sprint supported at 5.

¹⁴ See NENA at 2, OPASTCO at 2-3, Pacific at 6-7, SBC at 2, TRA at 2.

¹⁵ Act Sec. 3(a)(46).

This definition applies to both the Sec. 251 interconnection obligations and the Sec. 271 “competitive checklist” requirements.¹⁶ Although the Commission has the authority to adopt rules implementing Sec. 251, it does not have the power to redefine number portability under the Act.¹⁷ This is expressly stated in the context of “competitive checklist” requirements, as the Act provides that the Commission “may not by rule or otherwise, limit or extend the terms used in the competitive checklist....”¹⁸ The Commission must, therefore, dismiss any attempts to redefine number portability under the Act.

NYNEX does provide limited “location portability” today.¹⁹ However, GTE correctly notes that the generally smaller geographic rate and wire centers of the LECs, as opposed to the new entrants, will disadvantage incumbent providers when porting numbers.²⁰ In order to address this issue, NYNEX has not objected to attempting a limited location portability capability in trials in New York State. Such trials provide an appropriate vehicle to identify and resolve issues associated with this type of number portability.

However, the NY DPS’ suggestion that the definition of service provider portability be expanded to include location portability - allowing an end user to move anywhere within the incumbent’s rate center or NPA boundary, whichever is smaller - is well beyond what NYNEX is currently able to provide. Additionally, such an expansion has raised potential concerns such as

¹⁶ Act Sec. 251(b) and Sec. 271(c)(2)(B)(xi).

¹⁷ Act Sec. 251(d).

¹⁸ Act Sec. 271(d)(4).

¹⁹ This limited capability allows end users who are changing locations within a central office’s geographical boundaries to keep their telephone numbers.

²⁰ See GTE at note 17.

customer confusion, rate disparity, unexpected toll charges, misrouting of calls, etc. Therefore, although the Commission may want to consider limited location portability at some point within this on-going number portability proceeding, it should be made clear that limited location portability is not required by the Act and that any such consideration by the Commission would be wholly independent of the Act's requirements.

The use of interim number portability (INP), pending Commission rules adopting a long term solution, is in compliance with the Act. Indeed - contrary to the assertions of Cox - INP is not only recognized by the Act, INP is stated by the Act to meet the number portability requirements of the "competitive checklist". The Act states that the competitive checklist is satisfied by:

Until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations.²¹

This provision directly contradicts Cox's assertion that INP does not satisfy checklist requirements.²² Clearly, Congress did not intend to delay authorization to provide in-region inter- LATA relief until a long term number portability solution had been developed.

²¹ Act Sec. 271(c)(2)(B)(xi).

²² See Cox at 5.

IV. CONCLUSION

NYNEX's recommendations are valid and justified as borne out by industry dissension reflected in the Comments of March 29, 1996. NYNEX's recommendations are that the Commission move forward to prescribe regulations for number portability:

- by developing a record on the issue of cost recovery;
- establishing ground rules for how cost recovery will take place in conformance with the Act;
- and using industry fora and state activities to determine when and how the industry should transition to a truly technically feasible long term database driven solution for number portability.

The requirements of the Act are clear regarding the definition of number portability and the use of INP. The attempts by various parties to misstate these requirements are inconsistent with the Act and must therefore be rejected by the Commission.

Respectfully submitted,

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Dated: April 5, 1996
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CERTIFICATE OF SERVICE

I certify that I caused one copy of the attached NYNEX Comments to be served on each of the persons on the attached list by US Mail on April 5, 1996. The attached list includes designated representatives to the parties in Docket CC 95-116.



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